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HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Agency Interest (AI) No. 44866
Activity No. PER20080003

Mr. Vic Schubert
Manager, Norco Plant
Rain CII Carbon, Inc
PO Box 220
Norco, LA 70779

RE: **Prevention of Significant Deterioration (PSD) Permit, PSD-LA-582 (M-3) Rain CII**
Carbon LLC - Norco Coke Plant
Rain CII Carbon LLC, Norco, St. Charles Parish, Louisiana

Dear Mr. Schubert:

Enclosed is your permit, PSD-LA-582 (M-3). Construction of the proposed project is not allowed until such time as the corresponding Part 70 Operating Permit is issued.

Should you have any questions, contact Rusty J. Jack of the Air Permits Division at (225) 219-0513.

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary

Date

CSN: rjj

c: US EPA Region VI

Agency Interest No. 44866

PSD-LA-582 (M-3)

**AUTHORIZATION TO CONSTRUCT AND OPERATE A MODIFIED MAJOR SOURCE
PURSUANT TO THE PREVENTION OF SIGNIFICANT DETERIORATION
REGULATIONS IN LOUISIANA ENVIRONMENTAL REGULATORY CODE,
LAC 33:III.509**

In accordance with the provisions of the Louisiana Environmental Regulatory Code, LAC 33:III.509,

Rain CII Carbon LLC
801 Prospect Ave
Norco, LA 70079

is authorized to do a minor modification at the Rain CII Carbon LLC - Norco Coke Plant near

801 Prospect Ave
Norco, LA 70079

subject to the emissions limitations, monitoring requirements, and other conditions set forth hereinafter.

This PSD permit does not authorize the construction of any additional new or modified sources.

Signed this _____ day of _____, 2008.

Cheryl Sonnier Nolan
Assistant Secretary
Office of Environmental Services
Louisiana Department of Environmental Quality

BRIEFING SHEET

Rain CII Carbon LLC - Norco Coke Plant

Agency Interest No.: 44866

Rain CII Carbon LLC

Norco, St. Charles Parish, Louisiana

PSD-LA-582 (M-3)

PURPOSE

A minor modification to change the facility's sulfur dioxide (SO₂) emission limits based on a change in the calculation methodology used to estimate SO₂ emissions and an increase in the amount of allowable coffee chaff combusted in the pyroscrubber.

RECOMMENDATION

Approval of the proposed construction and issuance of a permit.

REVIEWING AGENCY

Louisiana Department of Environmental Quality, Office of Environmental Services, Air Permits Division

PROJECT DESCRIPTION

The Norco Facility processes green petroleum coke to produce calcined coke, which is used in the manufacturing of anodes for the aluminum industry. Green petroleum coke is received from an adjacent oil refinery and placed in storage bins. Green coke may also be received by truck. The green coke is fed to a countercurrent natural gas rotary kiln, where residual moisture and volatile compounds are removed. The calcined coke is discharged from the kiln into a rotary cooler where it is quenched by water and treated with a chemical wetting agent for dust control. The calcined coke is transported by screw conveyor and bucket elevators to storage bins for loadout into railcars or trucks.

The kiln flue gases are routed through a settling chamber and into the pyroscrubber for destruction of volatile materials not removed in the rotary kiln and particulates. The pyroscrubber retention time is 14 seconds. This length of time enhances the destruction of particulate fines and volatile compounds.

Heat energy (225 MMBTU/hr) generated during the coke calcining process is recovered in the heat recovery boiler (HRB) to produce steam (1,350 psi). The flue gases from the heat recovery boiler are directed through a high temperature baghouse to control particulate matter (PM) and sulfur trioxide (SO₃) emissions and the formation of a visible plume. Steam production is enhanced by injecting coffee chaff directly into the pyroscrubber. The Norco Coke Plant currently combust 22 tons per day of coffee chaff in the pyroscrubber as supplemental fuel.

BRIEFING SHEET

Rain CII Carbon LLC - Norco Coke Plant
Agency Interest No.: 44866
Rain CII Carbon LLC
Norco, St. Charles Parish, Louisiana
PSD-LA-582 (M-3)

The following table shows the emission changes in tons per year associated with the project:

Pollutant	Project Change	PSD de minimis	Review required?
PM ₁₀	+ 0.45	15	No
SO ₂	+ 526.64	40	No*
NO _x	0.00	40	No
CO	0.00	100	No
VOC	0.00	40	No

(*) - 522.31 of the 526.64 tons per year of SO₂ increase is due to a change in calculation methodology for green coke emissions and newly identified sulfur content in the coffee chaff. No physical change or change in the method of operation is associated with this SO₂ emissions increase. The remaining 4.33 tons per year increase in SO₂ is due to an operational change in coffee chaff combustion, which is below the SO₂ de minimis level of 40 tons per year. Therefore, no PSD review is required.

TYPE OF REVIEW

The requested minor modification was reviewed in accordance with PSD regulations. There are no significant increases in emissions due to this project and a full PSD review is not necessary. There is no impact of toxic compounds emissions due to the project on ambient air quality.

BEST AVAILABLE CONTROL TECHNOLOGY

Additional Best Available Control Technology (BACT) analysis is not required for a minor modification. The use of proper operational practices and green coke feed with an average sulfur content of 2.25% or less by weight is still adequate BACT for the control of SO₂ emissions. And, there are still no technologies approved as BACT for NO_x reduction in the calcining industry.

AIR QUALITY IMPACT ANALYSIS

Prevention of Significant Deterioration regulations require an analysis of existing air quality for those pollutants emitted in significant amounts from a proposed modification or new facility. No significant increase in emissions of any criteria pollutant is associated with this project, precluding the requirements for ambient impact analysis.

BRIEFING SHEET

Rain CII Carbon LLC - Norco Coke Plant

Agency Interest No.: 44866

Rain CII Carbon LLC

Norco, St. Charles Parish, Louisiana

PSD-LA-582 (M-3)

ADDITIONAL IMPACTS

Since there is no significant increase in emissions to the air, soils, or vegetation, visibility will not be adversely impacted by the proposed minor modification, nor will any Class I area be affected. The project will not result in any significant secondary growth effects.

PROCESSING TIME

Application Dated:	May 19, 2008
Application Received:	May 19, 2008
Effective Completeness Date:	June 26, 2008

PUBLIC NOTICE

A notice requesting public comment on the proposed project was published in *The Advocate*, Baton Rouge, Louisiana, on <<Date>>, 200x; and in <<Local Paper>>, <<City>>, Louisiana, on <<Date>>, 200x. Copies of the public notice were also mailed to individuals who have requested to be placed on the mailing list maintained by the Office of Environmental Services on <<Date>>, 200x. A proposed permit was also submitted to U.S. EPA Region VI on <<Date>>, 200x. All comments will be considered prior to a final permit decision.

PRELIMINARY DETERMINATION SUMMARY

Rain CII Carbon LLC - Norco Coke Plant

Agency Interest No.: 44866

Rain CII Carbon LLC

Norco, St. Charles Parish, Louisiana

PSD-LA-582 (M-3)

June 26, 2008

I. APPLICANT

Rain CII Carbon LLC
801 Prospect Ave
Norco, LA 70079

II. LOCATION

CII Carbon, LLC - Norco Facility is located east of Norco near the intersection of LA Highways 61 and 627. Approximate UTM coordinates are 750.1 kilometers East and 3,321.7 kilometers North, Zone 15.

III. PROJECT DESCRIPTION

The following table shows the emission changes in tons per year associated with the project:

Pollutant	Project Change	PSD de minimis	Review required?
PM ₁₀	+ 0.45	15	No
SO ₂	+ 526.64	40	No*
NO _x	0.00	40	No
CO	0.00	100	No
VOC	0.00	40	No

(*) - 522.31 of the 526.64 tons per year of SO₂ increase is due to a change in calculation methodology for green coke emissions and newly identified sulfur content in the coffee chaff. No physical change or change in the method of operation is associated with this SO₂ emissions increase. The remaining 4.33 tons per year increase in SO₂ is due to an operational change in coffee chaff combustion, which is below the SO₂ de minimis level of 40 tons per year. Therefore, no PSD review is required.

IV. SOURCE IMPACT ANALYSIS

A proposed net increase in the emission rate of a regulated pollutant above de minimis levels for new major or modified major stationary sources requires review under Prevention of Significant Deterioration regulations, 40 CFR 52.21. PSD review entails the following analyses:

A. A determination of the Best Available Control Technology (BACT);

PRELIMINARY DETERMINATION SUMMARY

Rain CII Carbon LLC - Norco Coke Plant

Agency Interest No.: 44866

Rain CII Carbon LLC

Norco, St. Charles Parish, Louisiana

PSD-LA-582 (M-3)

June 26, 2008

- B. An analysis of the existing air quality and a determination of whether or not preconstruction or postconstruction monitoring will be required;
- C. An analysis of the source's impact on total air quality to ensure compliance with the National Ambient Air Quality Standards (NAAQS);
- D. An analysis of the PSD increment consumption;
- E. An analysis of the source related growth impacts;
- F. An analysis of source related growth impacts on soils, vegetation, and visibility;
- G. A Class I Area impact analysis; and
- H. An analysis of the impact of toxic compound emissions.

A. BEST AVAILABLE CONTROL TECHNOLOGY

Additional Best Available Control Technology (BACT) analysis is not required for a minor modification. The use of proper operational practices and green coke feed with an average sulfur content of 2.25% or less by weight is still adequate BACT for the control of SO₂ emissions. There are still no technologies approved as BACT for NO_x reduction in the calcining industry.

B. ANALYSIS OF EXISTING AIR QUALITY

Prevention of Significant Deterioration regulations require an analysis of existing air quality for those pollutants emitted in significant amounts from a proposed modification or new facility. No significant increase in emissions of any criteria pollutant is associated with this project, precluding the requirements for ambient impact analysis.

C. NATIONAL AMBIENT AIR QUALITY STANDARDS (NAAQS) ANALYSIS

Modeling analyses indicated concentrations of each pollutant would be below PSD ambient significance levels. Refined NAAQS modeling was not required.

D. PSD INCREMENT ANALYSIS

Modeling analyses indicated concentrations of each pollutant would be below PSD ambient significance levels. PSD increment modeling was not required.

E. SOURCE RELATED GROWTH IMPACTS

Operation of this facility is not expected to have any significant effect on residential growth or

PRELIMINARY DETERMINATION SUMMARY

Rain CII Carbon LLC - Norco Coke Plant

Agency Interest No.: 44866

Rain CII Carbon LLC

Norco, St. Charles Parish, Louisiana

PSD-LA-582 (M-3)

June 26, 2008

industrial/commercial development in the area of the facility. No significant net change in employment, population, or housing will be associated with the project. As a result, there will not be any significant increases in pollutant emissions indirectly associated with Rain CII Carbon LLC's proposal.

F. SOILS, VEGETATION, AND VISIBILITY IMPACTS

There will be no significant impact on area soils, vegetation, or visibility.

G. CLASS I AREA IMPACTS

Louisiana's Breton National Wildlife Area, the nearest Class I area, is over 100 kilometers from the site, precluding any significant impact.

H. TOXIC EMISSIONS IMPACT

Currently, the facility does not emit toxic compounds.

V. CONCLUSION

The Air Permits Division has made a preliminary determination to approve reconciliation of the Prevention of Significant Deterioration (PSD) limits at the Rain CII Carbon LLC - Norco Coke Plant near Norco, in St. Charles Parish, Louisiana, subject to the attached specific and general conditions. In the event of a discrepancy in the provisions found in the application and those in this Preliminary Determination Summary, the Preliminary Determination Summary shall prevail.

SPECIFIC CONDITIONS

Rain CII Carbon LLC - Norco Coke Plant

Agency Interest No.: 44866

Rain CII Carbon LLC

Norco, St. Charles Parish, Louisiana

PSD-LA-582 (M-3)

1. The permittee is authorized to operate in conformity with the specifications submitted to the Louisiana Department of Environmental Quality (LDEQ) as analyzed in LDEQ's document entitled "Preliminary Determination Summary" dated June 26, 2008 and subject to the following emissions limitations and other specified conditions. Specifications submitted are contained in the application and Emission Inventory Questionnaire dated May 10, 2007, along with supplemental information dated January 22, 2008 and February 4, 2008.

2.

MAXIMUM ALLOWABLE OPERATING AND EMISSION RATES					
Emission Point No.	Description	Units	SO ₂	NO _x	Operating Schedule
N-7	Pyroscrubber Stack (Average Green Coke Feed Rate: 42 TPH)	lb/hr	1,544.88	110.00	2,160 hrs/yr
		TPY	*	*	
N-8	Heat Recovery Boiler Stack (Average Green Coke Feed Rate: 42 TPH)	lb/hr	1,544.88	130.00	8,400 hrs/yr
		TPY	*	*	
N-CAP78**	Pyroscrubber/HRB CAP	TPY	3,886.84	395.00	8,400 hrs/yr
* Annual emissions capped under Emission Point N-CAP78. Emission Point N-7, Pyroscrubber Stack, has an operating limit of 2,160 hours/year (max), and the stack will not operate concurrently with Emission Point N-8, Heat Recovery Boiler Stack.					
** This emission point is an emission CAP for the Pyroscrubber Stack (N-7) and Heat Recovery Boiler Stack (N-8).					

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire submitted on May 10, 2007, along with supplemental information dated January 22, 2008, February 4, 2008, and May 19, 2008.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 - C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
 - 1. Report by June 30 to cover January through March
 - 2. Report by September 30 to cover April through June
 - 3. Report by December 31 to cover July through September
 - 4. Report by March 31 to cover October through December
 - D. Each report submitted in accordance with this condition shall contain the following information:

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

1. Description of noncomplying emission(s);
 2. Cause of noncompliance;
 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
 - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
 - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
 - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.
- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.
- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services in accordance with LAC 33:I.Chapter 19.Facility Name and Ownership/Operator Changes Process.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:

1. Generally be less than 5 TPY
2. Be less than the minimum emission rate (MER)
3. Be scheduled daily, weekly, monthly, etc., or
4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

XVIII. Provisions of the permit may be appealed to the secretary in writing pursuant to La. R.S. 30:2024(A) within 30 days from notice of the permit action. A request may be made to the secretary to suspend those provisions of the permit specifically appealed. The permit remains in effect to the extent that the secretary or assistant secretary does not elect to suspend the appealed provisions as requested or, at his discretion, other permit provisions as well. Construction cannot proceed, except as specifically approved by the secretary or assistant secretary, until a final decision has been rendered on the appeal. A request for hearing must be sent to the Office of the Secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division
La. Dept. of Environmental Quality
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

XIX. For Part 70 sources, certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

TABLE I: BACT COST SUMMARY

Rain CII Carbon LLC - Norco Coke Plant
Agency Interest No.: 44866
Rain CII Carbon LLC
Norco, St. Charles Parish, Louisiana
PSD-LA-582 (M-3)

Based on a "top down" BACT analysis, wet lime scrubbing was shown to be a technically feasible option for SO₂ control in the original PSD permit, but the costs involved with the technology prohibited its use. According to CII, wet lime scrubbing with energy recovery technology would have an incremental cost effectiveness of \$3,134 per ton of SO₂ removed. In addition, the technology would have an added cost of \$41 per ton of calcined coke produced. Based on economic considerations, this technology was rejected as BACT. CII has also stated that wet lime scrubbing without energy recovery would have an incremental analysis cost effectiveness of \$2,036 per ton of SO₂ removed, but the technology would have an added cost of \$32 per ton of calcined coke produced. Based on economic considerations, this technology was also rejected as BACT.

The table below shows the BACT costs and updated costs based on the requested change in calculations methodology. Although the incremental cost effectiveness does decrease by approximately 15%, the additional cost per ton of production does not change. Therefore, CII believes that the original BACT analysis would not have changed based on the new calculation methodology.

Control Option	Total Annual Cost (\$1,000)	Removal Efficiency (%)	Pre-Control Emissions (TPY)	Post-Control Emissions (TPY)	Total Cost Effectiveness (\$/ton)	Incremental Cost Effectiveness (\$/inc. ton)	Additional Cost Per Ton of Production (\$/ton)
Wet Lime Scrubbing with Turbine Generator							
Original	12,000	95	3,360	168	3,759	3,134	41
Updated			3,864*	193	3,269	2,723	
Wet Lime Scrubbing without Turbine Generator							
Original	8,500	95	3,360	168	2663	2,036	32
Updated			3,864	193	2315	1,770	

(*) – Updated emissions are based solely on the change in calculation methodology and do not reflect the separate coffee chaff project.

TABLE II: AIR QUALITY ANALYSIS SUMMARY

Rain CII Carbon LLC - Norco Coke Plant
Agency Interest No.: 44866
Rain CII Carbon LLC
Norco, St. Charles Parish, Louisiana
PSD-LA-582 (M-3)

Pollutant	Averaging Period	Preliminary Screening Concentration ($\mu\text{g}/\text{m}^3$)	Level of Significant Impact ($\mu\text{g}/\text{m}^3$)	Significant Monitoring Concentration ($\mu\text{g}/\text{m}^3$)	At the Monitoring Station		Background ($\mu\text{g}/\text{m}^3$)	Maximum Modeled Concentration ($\mu\text{g}/\text{m}^3$)	Modeled + Background Concentration ($\mu\text{g}/\text{m}^3$)	NAAQS ($\mu\text{g}/\text{m}^3$)	Modeled PSD Increment Consumption ($\mu\text{g}/\text{m}^3$)	Allowable Class II PSD Increment ($\mu\text{g}/\text{m}^3$)
PM ₁₀	24-hour	NR	5	10	NR	NR	NR	NR	NR	150	NR	30
	Annual	NR	1	-	NR	NR	NR	NR	NR	50	NR	17
SO ₂	3-hour	NR	25	-	NR	NR	NR	NR	NR	1300	NR	512
	24-hour	NR	5	13	NR	NR	NR	NR	NR	365	NR	91
NO _x	Annual	NR	1	-	NR	NR	NR	NR	NR	80	NR	20
	Annual	NR	1	14	NR	NR	NR	NR	NR	100	NR	25
CO	1-hour	NR	2000	-	NR	NR	NR	NR	NR	40,000	NR	-
	8-hour	NR	500	575	NR	NR	NR	NR	NR	10,000	NR	-
Lead	3-month	NR	-	0.1	NR	NR	NR	NR	NR	1.5	NR	-
NR = Not required.												